UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ARTHUR HAYES, BENJAMIN DELO, SAMUEL REED and GREGORY DWYER,

Defendants.

20 Cr. 500 (JGK)

ORAL ARGUMENT REQUESTED

## NOTICE OF DEFENDANTS' MOTION FOR A BILL OF PARTICULARS

PLEASE TAKE NOTICE that Defendants Arthur Hayes, Benjamin Delo, and Samuel Reed ("Defendants"), by and through their undersigned counsel, hereby move this Court before the Honorable John G. Koeltl, United States District Judge for the Southern District of New York, 500 Pearl Street, Courtroom 14A, New York, New York 10007, at a date and time to be determined by the Court, for an Order directing the government to provide a bill of particulars pursuant to Federal Rule of Criminal Procedure 7(f) and for such other and further relief as the Court deems just and proper (the "Motion").

PLEASE TAKE NOTICE that the Motion is made and based on this Notice of Motion, the accompanying Memorandum of Law, and the Declaration of Andrew J. Rodgers filed concurrently with exhibits in support hereof, and on such other pleadings, oral and documentary evidence, and arguments as may be presented to the Court.

Dated: September 10, 2021 New York, New York

## /s/ Andrew J. Rodgers

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## Respectfully submitted,

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